U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2



Emergency and Remedial Response Division 290 Broadway, 19th Floor New York, New York 10007-1866

By Email

MEMORANDUM

TO: Ms. Suzy Walls

FROM: Tanya Mitchell

DATE: November 18, 2014

RE: Comments on the Revised Data Gaps Sampling and Analysis Plan, November 2014,

Rolling Knolls Landfill Superfund Site, Chatham, New Jersey

Attached are EPA's comments on the Revised Data Gaps Sampling and Analysis Plan dated November 2014, prepared by ARCADIS, for the Rolling Knolls Superfund Site in Chatham Township, New Jersey. Please review this document and send a revised SAP (including the live file). Upon receipt, I will review and forward an approval.

Should you have any questions regarding this document or request, please contact me at (212) 637-4362.

3.4.3 Analysis of Pore-Water Samples

Pore-water samples collected using regenerated cellulose membrane samplers will be analyzed for TCL VOCs and TAL Metals (filtered only) and cyanide. Additional pore-water will be collected using PushPoint techniques (methods not currently defined) and analyzed for SVOCs, SVOCc SIM, pesticides, and PCBs (as Aroclors). Certain SVOCs in the TCL will be analyzed by SIM to obtain a lower detection limit.

4. Schedule

Phase 1 Field Work

- · Submittal of permit equivalencies November 18, 2014
- · Soil sample collection November 20 through December 5, 2014
- · Installation of pore-water samplers December 2, 2014
- · Redevelopment of existing wells November 24 through November 26, 2014
- · Temporary monitoring well installation and sampling December 1 through December 5, 2014
- · Surface water and sediment sampling December 2 through December 11, 2014
- · Recovery of pore-water samplers and sample collection December 16, 2014
- · Assessment of Hunt Club well HC-1 December 5, 2014
- · Sampling of existing wells December 8 through December 12, 2015

· Sample analysis – November 21, 2014 through January 19, 2015

Data Review and Document Preparation for Phase I

- · Data validation January 13, 2015 through February 12, 2015
- · Preparation of Interim Technical Memorandum December 12, 2014 through February 12, 2015
- · Submit Interim Technical Memorandum to USEPA February 13, 2015
- · USEPA review of Interim Technical Memorandum February 16 through March 6, 2015
- · Receive USEPA approval of proposed permanent well locations March 9, 2015

Phase 2 Field Work

- · Obtain well permits March 9 through March 27, 2015
- · Install and develop proposed permanent wells March 30 through April 10, 2015
- · Second groundwater sampling event (all new monitoring wells, and selected existing monitoring wells based on the results of the first groundwater sampling even) April 27 through May 7, 2015
- \cdot Third groundwater sampling event (all new monitoring wells) July 27 through August 7, 2015
- · Groundwater sample analysis April 28 through September 7, 2015
- · Evaluation of connection between surface water and groundwater April 10 through July 6, 2015

Data Review and Document Preparation for Phase 2

- · Data validation June 7, 2015 through June 21, 2015
- · Preparation of Interim Technical Memorandum May 8, 2014 through July 12, 2015
- · Submit Final Data Gaps 2014-2015 Sampling Event Summary Report to USEPA July 13, 2015

Final Reporting

- · Data validation of third groundwater sampling event September 8, 2015 through September 21, 2015
- Begin preparation of draft Remedial Investigation report September 22, 2015

The final submittal date for the draft Remedial Investigation report will depend on completion of the BERA and cannot be determined at this time. Development of the BERA Work Plan will begin after the results of the Phase 1 field work are received. Completion of this work plan, review of the work plan by USEPA, and implementation of the BERA will proceed in parallel with the implementation of the Data Gaps SAP. A schedule for the BERA will be provided in the BERA Work Plan.

Table 1

Footnote 2: Pore water samples for VOCs and TAL metals plus cyanide (unfiltered) will be collected via passive diffusion bags. Sampling methods for SVOCs, pesticides, and PCBs (as Aroclors) are under review will be collected using PushPoint techniques.

Pore water PushPoint sampling method and hierarchy of analyses are SVOCs, pesticides, and PCBs (as Aroclors), pesticides, and SVOCs. will be presented in an addendum to the SAP and OAPP.